

Privacy Notice to California Employees

Effective date: January 1, 2023

1. Scope of This Notice

This notice is for California residents who are employed at Sentinel Offender Services, LLC (“Sentinel,” “us,” or “we”), whether as an employee or independent contractor). It describes how Sentinel may collect, use and disclose your Personal Information in connection with your employment. It also explains related rights, and how you can exercise them, under the California Consumer Privacy Act of 2018, as amended (the “CCPA”). The CCPA broadly defines a “consumer” as a resident of California.

When we say “Personal Information,” we mean information that can reasonably be linked to a particular individual or their household. Generally speaking, your Personal Information includes your unique identifiers (full name, phone number, email address, username, etc.), and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you. “Non-Personal Information,” on the other hand, has been anonymized, aggregated or de-identified such that it cannot reasonably be linked to a particular individual or their household.

Personal Information does not include the contents of electronic communications that you send or receive using an account supplied by Sentinel for work purposes, or information that the CCPA excludes from its definition of Personal Information.

2. Employee Personal Information We Collect and How We Collect It

Categories Collected

- **Identifiers**, such as your full name, signature, home address, phone number, email address, IP address, unique device identifier
- **Demographic Information**, such as your age, gender, date of birth, race, ethnic origin, current and past citizenship status, marital status, disability and veteran or military status. Demographic information may include legally protected classifications.
- **Emergency Contact Information**, such as your emergency’s contact’s full name, nature of relationship with you, address, phone number
- **Financial Information**, such as bank account number

- **Geolocation Data**, such as your approximate location when you access our corporate network
- **Internet or Network Activity**, such as data about your use of computer systems, software, networks or connected devices owned or controlled by Sentinel
- **Sensitive Personal Information** (as defined in the CCPA), including social security, driver's license, state ID or passport number; your precise geolocation when you access our corporate network; racial or ethnic origin; medical or health insurance information

Sources and Methods of Collection

We may collect Personal Information from you when you provide it for employee onboarding, payroll and benefits processing, or other employment related purposes. We may also collect Personal Information via automatic means, such as the Internet or Network Activity when you use our corporate network. We may also receive Personal Information from third parties, with your consent or where required by law; or from public sources such as public social media platforms.

3. How We Use Employee Personal Information

We may use your Personal Information for the following purposes:

- To establish your user account and scope of access to Sentinel's corporate network
- To process payroll and other forms of compensation
- To provide insurance and other benefits to you or your dependents
- To determine benefit levels and eligibility
- To enhance workplace health and safety
- To enforce workplace policies
- To make reasonable accommodations for a disability
- To process requests for medical or family leave
- To reimburse business expenses
- To pay professional dues or other expenses on your behalf
- To protect Sentinel's office space, computer network and information assets against unauthorized access
- To communicate with you about compensation or other issues related to your employment
- To comply with applicable laws and protect Sentinel's legal rights
- In any other way we may describe when we collect the information; and
- For any other purpose with your consent.

We may use Non-Personal Information for any purpose.

4. Data Retention

Typically, we retain employee Personal Information for the period necessary to fulfill the purposes outlined in this Notice, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

5. Sale, Sharing or Disclosure Of Employee Personal Information

Under the CCPA, you can request to opt-out of the “Sale” of your Personal Information—which the CCPA defines very broadly to include some transactions or arrangements that do not involve the exchange of data for money—and the “Sharing” of your personal information, which the CCPA defines as sharing with third parties for purposes of cross-site targeted advertising. We don’t Sell or Share employee Personal Information.

Within the past 12 months, we disclosed the categories of Personal Information collected for a business purpose to service providers.

In addition to disclosing your Personal Information to service providers, we may disclose your Personal Information in the following contexts:

Mandatory Disclosures and Legal Proceedings

We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena, or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies, protect our property, services, and legal rights, prevent fraud, support auditing, compliance, and corporate governance functions, or comply with applicable law.

Change In Control or Merger

We may transfer your information in the event of the sale of substantially all of the assets of our business to a third-party or in the event of a corporate merger, consolidation, acquisition or reorganization. However, in such an event, any acquirer will be subject to the provisions of our commitments to you or we will not disclose your information.

With Your Direction or Consent

We will share your Personal Information with other third parties as you may direct or otherwise consent.

6. Your Rights as a Californian

Consumers (California residents) have the right to make the following requests to covered businesses. The requests may be made by a consumer, by a consumer on behalf of the consumer's minor child, or by a person authorized by the consumer to act on the consumer's behalf. Sentinel may decline to honor any request if doing so would conflict with its rights or obligations under applicable law, including but not limited to California or federal employment law or regulations.

Right To Request Information About Collection, Disclosure, Sale or Sharing

You have the right to request that a business disclose to you: (i) the categories and specific pieces of Personal Information the business has collected about you within the past 12 months, (ii) the categories of sources from which the Personal Information is collected, (iii) the business or commercial purposes for collecting, Selling or Sharing Personal Information, and (iv) the categories of third parties to whom the business discloses Personal Information.

If a business Sells or Shares Personal Information, or discloses it for a business purpose, you also have the right to request that the business disclose the following with respect to the 12-month period preceding your request: (i) the categories of Personal Information that the business Sold or Shared about you and the categories of third parties to whom the Personal Information was Sold or Shared, and (ii) the categories of Personal Information that the business disclosed about you for a business purpose.

This type of request may be referred to as a "Request to Know." Before we can honor a Request to Know, we need to verify that the person making it is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized disclosure.

Right to Request Deletion

You have the right to request that a business delete any Personal Information that the business has collected from you. This type of request may be referred to as a "Request to Delete."

Before we can honor a Request to Delete, we need to verify that the person making the request is the consumer whose Personal Information we have. Our method for verifying any particular request weighs information we receive as part of the request, the sensitivity of the consumer information at issue, and the risk of harm to the consumer from unauthorized deletion.

We are not required to delete Personal Information if we still need it in order to perform a contract with you, comply with a legal obligation, enable internal uses that are consistent with the context in which you provided the information, or accomplish any other objective recognized as an exception to the right to deletion under applicable law.

Right to Request Correction

You have the right to request that a business correct inaccurate Personal Information about you. This type of request may be referred to as a “Request to Correct.”

Right to Opt-Out of Sale or Sharing

You have the right to direct a business that Sells or Shares Personal Information about you to third parties not to Sell or Share your Personal Information. This type of request may be referred to as a “Request to Opt-Out.”

Right to Limit Use and Disclosure of Sensitive Personal Information

If a business collects Sensitive Personal Information* for the purpose of inferring characteristics about you, you have the right to request that the business limit its use and disclosure of your Sensitive Personal Information to that use and disclosure which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods and services. (Sentinel does not collect Sensitive Personal Information for the purpose of inferring characteristics about you within the meaning of the CCPA.)

*Sensitive Personal Information includes social security number; driver’s license or state identification number; complete account log-in credentials; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer’s mail, email and text messages (unless the business is the intended recipient of the communication); genetic data; biometric information; health information; and information concerning sex life or sexual orientation.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment by a business for the exercise of your privacy rights under the CCPA.

7. How To Exercise Your Rights with Sentinel

How to Submit a Request To “Know,” “Delete” or “Correct”

You can submit a Request to Know, Delete or Correct to privacy@sentineladvantage.com. The request must state “CCPA Request” and include:

- your first and last name;
- an email address at which you can be reached for purposes of the request;
- the California county in which you reside;
- for a Request to Know, the disclosure(s) you are requesting;
- for a Request to Delete, a clear statement that you want us to delete your Personal Information; and
- the reason(s) you believe we have collected, disclosed or sold your Personal Information, specifically, within the past 12 months (for example, you purchased a product or received a communication from us)

If you are submitting a request on behalf of an employee as their authorized representative, you must include the foregoing information about the consumer and provide proof of permission from the consumer to make the request.

After confirming receipt of your request, we'll contact you if we need more information in order to verify it. If we can't verify a request, we may deny it.

8. Changes To This Notice

We reserve the right to update or change this Notice or our Privacy Policy at any time and you should check them periodically. If we make any material changes, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

9. Contact Us

If you have any questions or concerns about this Notice, please contact us via privacy@sentineladvantage.com.